## Poles Tublin Stratakis & Gonzalez, LLP 46 Trinity Place – Fifth Floor New York, New York 10006-2288

Writer's New York Telephone Ext.: 232 Writer's Email: jpoles@polestublin.com

Telephone (212) 943-0110 Facsimile (212) 269-9875

Respond to New York, New York Address

February 5, 2015

VIA ECF AND EMAIL

- Schofield NYSDChambers@nysd.uscourts.gov
- Jason H. Berland, Esq. , Beys Stein Mobargha & Berland LLP

@ jberland@beysstein.com

Hon. Lorna G. Schofield U.S. District Court, Southern District of New York 40 Centre Street – Courtroom 1106 New York, New York 10007

Re: Sea Trade Maritime Corporation et al. -v- Stelios Coutsodontis et al.

1:09-cv-00488 (LGS)(HBP)

Our File No. 26,090

Dear Judge Schofield:

We represent Captain Stelios Coutsodontis ('Capt. Coutsodontis') and Francesca Eleni Coutsodontis ('Francesca Coutsodontis'), defendants in the above-reference action. Defendants are writing in response to Plaintiffs' letter dated February 4, 2015 (Doc. No. 201). While we do not object to the request for a week's extension, we take exception to Plaintiffs' gratuitous, self-serving hyperbolic characterizations regarding discovery issues currently pending before Magistrate Judge Pitman. We respectfully advise the Court that while we have fully complied with Plaintiffs' lengthy Request to Produce Documents, said issues are nevertheless totally irrelevant to the issues raised in Defendants' motion for summary judgment.

We thank the Court in advance for its consideration and await its advices.

Very truly yours,

POLES TUBLIN STRATAKIS & GONZALEZ, LLP

/s/ John G. Poles

John G. Poles